

August 1, 2013

Received & Inspected

AUG -2 2013

FCC Mail Room

To: Office of the Secretary  
Federal Communications Commission  
Attention: Disability Rights Office, Room 3-B431  
445 12th Street SW  
Washington, DC 20554

From: Brent Clary, Media Director  
Southern Addiction TV  
332 O'Neal Drive  
Waverly Hal, GA 31831

Southern Addiction TV is a small locally-owned new television program pertaining to hunting and fishing. Our show is being produced strictly by an inexperienced staff with no prior background or affiliation with television. This being our first year, our budget is more than modest and expenses must be held to a minimum in order to continue.

It was designed to entertain primarily the local community and immediate surrounding area, targeted at small businesses with low-budget income. Therefore, our commercials are also minimally priced to allow affordable advertising to meet their needs. We currently produce our show with no salaries and donated time from individuals in the show. All of our current staff have other full-time jobs, and the show generates no income that supplements our expenses. None of the people participating in the show use any of their expenses for any write offs.

At this time, our show neither produces nor generates any funds over and above our basic cost of production, and barely that.

To continue to offer our show and our services to the community, we are unable to take on anymore overhead.

We look forward to increasing our viewing area and exposure, as well as increasing small independent businesses' income so they will be able to afford more comparable rates, allowing us to generate income in the future.

Our weekly production budget for our program includes production costs, such as editing, audio mastering, color grading, and mastering for broadcast. These expenses normally would generate a cost in the industry at \$1000+. We do this ourselves to allow us to pay our overhead. Closed-captioning at this time, costing anywhere from \$145-\$180, would more than generate a cost that would have to be passed on to our local small businesses. This would cause them to have a cost that would keep them from taking advantage of our advertising services, keeping them from competing in the market with large or national companies with large budgets.

Currently we acquire our base income from approximately 10 customers, generating \$920 per month. Our basic overhead of rent at \$400, electricity at \$35 or more, internet and phone at \$27, software at \$24.90, tape cost at \$50, water at \$8, computer rental at \$125, and airtime at \$200 per show, leaves us only approximately \$51 for miscellaneous or incidentals. Closed-captioning for the month would be a minimum of \$580, minus the \$51, with a negative cash flow, at the least.

Therefore, at this time, we are seeking a permanent waiver for any closed-captioning requirements for broadcast from the FCC. The additional cost at this time would cause us to be unable to run the show, thus not allowing us to offer services to the community and encouraging economic growth and community services.

Southern Addiction TV is a visionary group dedicated to encouraging community activities, economic growth, equal opportunity and traditional family values.

Thank you for your attention and consideration in this matter. Please do not hesitate to contact us with any questions or concerns you may have.

 8-1-13

Brent Clary  
Media Director  
Southern Addiction TV  
brent.clary@addiction hunting.com

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**Closed Captioning Compliance Certification**

Addiction Hunting certifies to WXTX Fox 54 that Southern Addiction TV, a 30-minute weekly program provided to the Station for broadcast by the Station, complies with the closed captioning requirements of the Federal Communications Commission (47 C.F.R. § 79.1) or will, as broadcast by the Station, be exempt from those requirements. Addiction Hunting agrees to notify Licensee of any change in this certification within 24 hours of such change, including any action by the Federal Communications Commission ("FCC") on any pending petition to waive the captioning requirements for the Programming (such as an FCC request to supplement the waiver petition or a grant or denial of the waiver petition).

Addiction Hunting agrees, to the fullest extent permitted by law, to protect, save, defend, and keep Licensee and its corporate parent and affiliates, and each of their officers, directors, employees, and agents, harmless and indemnify them from and against any and all losses, damages, liabilities, or expenses of any nature whatsoever, including reasonable attorneys' fees, in connection with any investigation, inquiry, or enforcement action by the FCC involving the Programming or any threatened or actual private claim or action involving the Programming.

By:

  
Signature

Brent Clary  
Southern Addiction TV  
Waverly Hall, GA

Date

1-8-13



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STATE OF GEORGIA  
HARRIS COUNTY

AFFIDAVIT OF BRENT CLARY

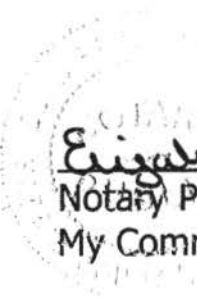

I, BRENT CLARY, being first duly sworn, depose and state:

1. I am the Media Director of Southern Addiction TV, a business in Waverly Hall, Georgia. I am over the age of 21.
2. I have reviewed the Petition for Exemption for Closed Captioning Requirements filed on behalf of Southern Addiction TV, and upon information and belief, believe the statements regarding our organization to be true and accurate.

FURTHER AFFIANT SAYETH NOT.

  
BRENT CLARY

SUBSCRIBED TO AND SWORN  
before me this 1<sup>st</sup> day of Aug., 2013.

  
  
Notary Public  
My Commission expires 2<sup>nd</sup> Day Feb. 2014.